

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-88-E**

IN RE: )  
 )  
Dominion Energy South Carolina, Inc.'s )  
2021 Avoided Cost Proceeding Pursuant to )  
S.C. Code Ann. Section 58-41-20(A) )  
\_\_\_\_\_ )

**CAROLINAS CLEAN ENERGY  
BUSINESS ASSOCIATION'S  
MOTION TO SHORTEN TIME TO  
RESPOND TO INTERROGTORIES.**

Pursuant to S.C. Code Ann. Regs. 103-829 the Carolinas Clean Energy Business Association ("CCEBA"), by and through its undersigned counsel, hereby moves this Commission to shorten the time by which London Economics International, LLC ("LEI") must respond to Interrogatories served by CCEBA and to require responses on or before October 1, 2021. In support of this motion, CCEBA shows this Commission the following:

(1) Pursuant to the Commission's prior order, discovery must be completed in this matter on or before October 5, 2021.

(2) LEI's Independent Report on Dominion Energy South Carolina, Inc.'s 2021 Avoided Cost Proceeding (Docket No. 2021-88-E) prepared for the Public Service Commission of South Carolina ("the LEI Report") was filed and served on the evening of September 16, 2021.

(3) CCEBA's counsel required time to review the LEI Report and consult with CCEBA's expert to prepare discovery requests, as authorized by the Commission.

(4) Even had CCEBA issued its discovery requests on September 17, 2021, the October 5 discovery deadline would have passed before the expiration of the 20-day response period set forth in Rule 103-833 (which would have expired on October 7, 2021).

(5) CCEBA has diligently worked to prepare Interrogatories for LEI and intends to file and serve those Interrogatories on September 22, 2021.

(6) A response date of October 1, 2021, would provide LEI with nine days to respond, and would provide CCEBA and its witnesses with one week to review the Interrogatory responses and any information produced by LEI and incorporate those responses into CCEBA's responsive testimony, currently due on October 8, 2021.

(7) Without adjustment of the due date for responses to the Interrogatories, CCEBA cannot comply with both Rule 103-833 and this Commission's scheduling order. Rule 103-833 contemplates that, upon Good Cause being shown, that this Commission can change the twenty day response period shown in that Rule.

(8) CCEBA does not make this motion for the purposes of harassment or inconvenience of LEI, but to provide sufficient time for LEI to respond to the Interrogatories and for CCEBA to prepare testimony in compliance with the Commission's scheduling order.

**WHEREFORE**, CCEBA, based upon Good Cause shown hereinabove, moves this Commission to allow CCEBA to serve Interrogatories upon LEI with a response deadline of October 1, 2021, and to thereby shorten the 20-day response time otherwise required under Rule 103-833.

Respectfully requested this 22<sup>nd</sup> day of September, 2021.

**[Signature Page Follows]**

Respectfully Submitted,

/s/Richard L. Whitt  
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Admitted *Pro Hac Vice*.

*Both as Counsel for Intervenor, Carolinas Clean Energy Business Association.*

September 22, 2021